

EXHIBIT D

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., *et al.*,
Debtors.

Chapter 11

Case No. 01-01139 (JKF)
Jointly Administered

Related Docket Nos. 19581, 19620

**ARROWOOD'S OBJECTIONS TO THE EIGHTEEN DEPOSITION NOTICES
ISSUED BY LANDIS RATH & COBB LLP AND COHN WHITESELL
& GOLDBERG LLP FOR THEIR OWN CLIENTS**

Arrowood, by its attorneys, O'Melveny & Myers LLP, hereby submits its objections to the notices ("Notices") purportedly served on Arrowood and others by Landis Rath & Cobb LLP, and Cohn Whitesell & Goldberg LLP (the "Libby Claimant Plaintiff Lawyers"), as follows:

1. Arrowood objects to the Notices to the extent that they unilaterally designate a particular day for the depositions to take place.
2. Arrowood objects to the Notices to the extent that they are overly-broad and seek to impose undue burden and expense on the estate and Arrowood.
3. Arrowood objects to the subject matters of inquiry to be made pursuant to the Notices to the extent they seek discovery concerning information, materials, events, people or other matters that are neither relevant to the subject matter of Confirmation nor reasonably calculated to lead to the discovery of admissible evidence.
4. Arrowood objects to the subject matters of inquiry to be made pursuant to the Notices to the extent they purport to require the witnesses to provide or to testify concerning legal opinions or conclusions, expert opinions or conclusions, or contentions in dispute at Confirmation.

5. Arrowood objects to the subject matters of inquiry to be made pursuant to the Notices on the grounds that they seek information more appropriately sought through other means of discovery and/or information contained in documents already in the possession of the defendants.

6. Arrowood objects to the Notices generally as overbroad, unduly burdensome, oppressive and as causing undue expense.

7. Arrowood objects to the Notices to the extent that the subject matters of the inquiries are overly broad, unduly burdensome, harassing, vexatious, and/or call for production of material that is not the subject of any specific allegation at issue at Confirmation, and are thus not reasonably calculated to lead to the discovery of admissible evidence.

Dated: April 27, 2009

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CERTIFICATE OF SERVICE

Please take notice that on this 27th day of April 2009, a copy of the *Arrowood's Objections to the Eighteen Deposition Notices Issued by Landis Rath & Cobb LLP and Cohn Whitesell & Goldberg LLP for Their Own Clients* was served on the following via first class mail:

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